

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Theodore Price

Case No.

17-945-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of between 1/1/17 and 7/12/17 in the county of Montgomery County in the Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. § 1030(a)(2)

Offense Description

Unauthorized access to a protected computer to commit another federal crime and for personal financial gain.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

S/A Albert Cabrelli, DHS

Printed name and title

Sworn to before me and signed in my presence.

Date: 7.12.2017 @ 2235



Judge's signature

City and state: Philadelphia, PA

DAVID R. STRAWBRIDGE, U.S. Magistrate Judge

Printed name and title

By permission by U.S. Magistrate Judge  
David Strawbridge

17-945-M

I, Albert Cabrelli, being duly sworn, states as follows:

INTRODUCTION

1. I am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE), Homeland Security Investigation (HSI). I have been employed as a Special Agent since August 2010. Prior to that, I was a Special Agent with the United States Naval Criminal Investigative Service from September 1999 through April 2007, followed by the United States Nuclear Regulatory Commission, Office of Investigations from April 2007 through August 2010. I am currently assigned to the Cyber Crimes Investigation Group in Philadelphia and am authorized to investigate violations of federal laws and execute search and arrest warrants. In my experience as a Special Agent with HSI, I have prepared, assisted and participated in the execution of numerous search warrants.
2. I have received formal training, as well as extensive on the job training, relative to the investigation of computer related cyber crimes.
3. On July 12, 2017 Theodore Price, DOB ~~01/12/1984~~, residing at 2701 Elory Road, Apartment F4, Hatfield, PA stated to me and Detective Pete Stark of the Northampton Township Police Department, Bucks County PA that he has created numerous software applications to defraud individuals, specifically individuals that own virtual currency known as Bitcoin. Price stated that he purchased software on the darknet and re-coded the software to create a virus to be placed on e-mail accounts specific to bitcoin wallets. In doing so Price stated that he has defrauded individuals and currently possesses sole access of over forty million (\$40,000,000.00) dollars. Price identified an approximate 100 page document, provided to Detective Stark by his girlfriend, with bitcoin vanities claiming that collectively equate to over fifty million (\$50,000,000.00) dollars. *This constitutes a violation of Title 18 USC 1030(a)(2).*
4. In addition, Price stated that he has been contracted by numerous foreign governments to develop penetration software, specifically a software he called "Zero Day". "Zero Day" is said by Price to control, monitor and/or pilfer information from android Chrome devices.
5. Price stated that he has a fraudulent passport under the name "Jeremy Renner", in that he was planning to rent a private jet and flee from the United States to evade Law Enforcement.

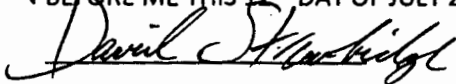


Albert Cabrelli

Special Agent, DHS

SWORN TO AND SUBSCRIBED

BEFORE ME THIS 12<sup>TH</sup> DAY OF JULY 2017



David R. Strawbridge

United States Magistrate Judge

*By permission by U.S. Magistrate Judge  
David Strawbridge*